

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)
)
)
v.)
)
DANIEL RUIZ,) 2:22-CR-35-gwc
Defendant)
)

**DEFENDANT'S UNOPPOSED MOTION
TO EXTEND TIME TO FILE PRETRIAL MOTIONS**

NOW COMES Defendant Daniel Ruiz, through counsel, and respectfully requests that the pretrial motions filing date be extended thirty (30) days from June 7, 2022 to July 7, 2022. This is the first request for an extension. The government does not oppose this request.

Basis for the request

1. Counsel needs additional time to review evidence, specifically video materials, in the case and discuss the evidence with Mr. Ruiz.
2. Mr. Ruiz is still considering a non-trial resolution in this matter.
2. Counsel respectfully submits that the failure to grant the continuance would likely result in a miscarriage of justice. This continuance is necessary; without a continuance, Mr. Ruiz would be deprived of the time necessary for effective discovery review, case preparation and a potential non-trial resolution, taking into account the exercise of due diligence by counsel.
3. Mr. Ruiz has been consulted about this continuance request and recognizes that any additional time granted will be excluded from computation under the Speedy Trial Act 18 U.S.C. § 3161(h)(7)(A).
4. The government, by Jon Ophardt, the Assistant United States Attorney assigned to the case, does not oppose this motion.

WHEREFORE, Daniel Ruiz respectfully requests that the Court grant the Defendant's Unopposed Motion to Extend Time to File Pretrial Motions, and that the Court set the new date for filing pretrial motions for July 7, 2022

Dated: June 6, 2022

By: /s/ Mary M. Nerino
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